

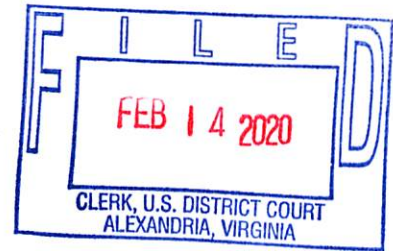
Case: 1:18: CV1562

US District Court 401 Courthouse Square, Alexandria, VA 22314

Vient, Plaintiff

vs.

Gannett Co., Inc., Defendant



Motion to Add Documents from October Hearing to Discovery Record

Pro-se Plaintiff Benjamin Vient Motions here to add Documents from an October 18, 2019 hearing to this case's Discovery record.

In Court on October 18, 2019, Pro-se Plaintiff read from these Documents, evidencing unauthorized use of Plaintiff's works by Defendant. Exhibit A attached here: Sales of works for \$2.95 each with a Newsbank: "The licensors of articles appearing on our Site have assured us that they have the right to authorize electronic distribution of articles." (This evidence appears to show use of 41 of Plaintiff's works by the Lebanon Daily News. Pro-se Plaintiff has requested these usage details from Defendant in Discovery.)

Pro-se Plaintiff is uncertain if Documents read at hearings become part of the record, so Motions here to add to the Discovery evidence record.

Respectfully submitted,

Benjamin Vient, Plaintiff Pro-Se

CERTIFICATE OF MAILING I HEREBY CERTIFY that on 2020, per previous agreement between parties to use designated email addresses, I sent a true and correct copy of the foregoing to Laurin Mills at laurin@samek-law.com.

Benjamin Vient